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6 Attorneys for Plaintiff

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**
11

12 JOHN D. THOMAS,) Case No. 8:23-cv-00236-DOC-JDE
) Assigned for all purposes to:
13 Plaintiff,)
14 vs.) DECLARATION OF DAVID G.
) EPSTEIN IN RESPONSE TO ORDER
15 LEAGLE, INC., a former Arkansas) TO SHOW CAUSE
16 corporation; and DOES 1-25,)
)
17 Defendants.)
)
18)
19)

20 I, David G. Epstein, say:

- 21 1. I am a licensed California attorney and have been admitted to the bar of
22 this court. I make this declaration in response to the court's order to show cause.
23 2. I have filed a proof of service in accordance with the court's order.
24 No answer or other responsive pleading has been received.
25 3. I have been out of town to celebrate my 80th birthday, and a sole
26 practitioner, and could not respond timely to the court order. I will
27
28



1 19return on July 20 and can have a request for entry of default entered
2 by the end of the week.

3 4. If called as a witness, I could and would testify to the matters contained
4 herein, which I know of my own personal knowledge, except for those matters
5 stated upon information and belief, and as to them, I believe them to be true.

6 5. I declare under penalty of perjury under the laws of the state of
7 California that the foregoing is true and correct.

8 Executed At Laguna Beach, California, on July 19, 2023.

9
10 */s/ David G. Epstein*

11 David G. Epstein, Declarant
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